

1 JOHN M. LUEBBERKE, City Attorney
State Bar No. 164893
2 SOPHIA M. RETCHLESS, Deputy City Attorney
State Bar No. 290200
3 425 N. El Dorado Street, 2nd Floor
Stockton, CA 95202
4 Telephone: (209) 937-8333
Facsimile: (209) 937-8898
5
6 Attorneys for Defendants
CITY OF STOCKTON, a municipal entity; and C. KNIGHT

7
8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 GERARDO RODRIGUEZ PACHECO, an) Case No. 2:20-CV-01404-TLN-KJN
individual; A.R., N.R., and G.R., minors by)
11 and thru their guardian ad litem, MAYRA) STIPULATION AND ORDER TO MOVE
VILLASENOR,) DISCOVERY DEADLINES
12)
Plaintiffs,)
13)
vs.)
14)
CITY OF STOCKTON, a municipal entity;)
15 C. KNIGHT, in his individual capacity as a)
police officer for the Stockton Police)
16 Department; and DOES 1-50, inclusive,)
17 Defendants.)
18

19 IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiffs and
20 Defendants by and through their designated counsel, that:

21 WHEREAS, the parties have been diligently working to schedule and take the remaining
22 Depositions in the current case. Provided that parties have had to change dates and
23 accommodations and due to impacted schedules of parties and deponents, the parties still have
24 outstanding depositions to take that are necessary to the case, parties believe that extending the
25 date for discovery deadlines will provide additional time to complete all necessary depositions
26 and conclude essential discovery;

27 WHEREAS, the current discovery schedule is set as:

28 Non-expert Discovery Cutoff: January 31, 2022

Expert Witness Disclosures: March 24, 2022
Rebuttal Expert Witness Disclosures: May 10, 2022
Expert Discovery Cutoff: July 7, 2022
Dispositive Motion Deadline: September 7, 2022

WHEREAS, the parties met and conferred and agreed to extend the discovery deadline as proposed below:

Non-expert Discovery Cutoff: April 1, 2022
Expert Witness Disclosures: May 23, 2022
Rebuttal Expert Witness Disclosures: July 11, 2022
Expert Discovery Cutoff: September 5, 2022
Dispositive Motion Deadline: November 7, 2022

IT IS SO AGREED.

Dated: POINTER & BUELNA, LLP

/s/ Patrick M. Buelna
PATRICK M. BUELNA
Attorneys for Plaintiffs

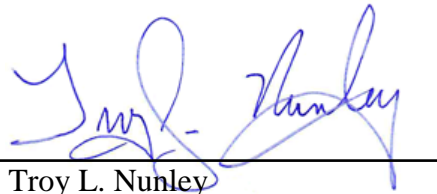
Dated: 1/31/2022 JOHN M. LUEBBERKE
CITY ATTORNEY

BY /s/ Sophia M. Retchless
SOPHIA M. RETCHLESS
DEPUTY CITY ATTORNEY

Attorneys for Defendants
CITY OF STOCKTON, et al.

IT IS SO ORDERED.

DATED: February 2, 2022


Troy L. Nunley
United States District Judge